



Katie M. Brown  
Counsel

Duke Energy  
40 W. Broad Street  
DSC 556  
Greenville, SC 29601

O: 864-370-5296  
F: 864-370-5027

Katie.Brown2@duke-energy.com

September 10, 2020

**VIA ELECTRONIC FILING**

The Honorable Jocelyn G. Boyd  
Chief Clerk/Executive Director  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, SC 29210

**Re: Underground Conduit Standards Change**

Dear Ms. Boyd:

The purpose of this letter is to provide information to the Commission concerning a change in Duke Energy Progress, LLC's ("DEP") and Duke Energy Carolinas, LLC's ("DEC") (together, the "Companies" or "Duke Energy") conduit standards, which will be implemented on November 1, 2020. This change requires no Commission action and is authorized under the Companies' existing Line Extension Plans, which are on file with the Commission.<sup>1</sup> The Companies provided this information to the Office of Regulatory Staff in advance of this filing.

In order to facilitate installation of the underground electric system, including cable, pad mounted transformers, switchgear, and pedestals, it may be necessary for builders and developers to install conduits at the direction of Duke Energy. The requirement for using conduit has been left up to the designer and construction in most cases. Through cable installation audits and discussions with designers, the Companies have discovered inconsistencies in the use of conduit and the need to better define the requirements for when to use conduit across the Carolinas.

The standard installation method for underground facilities will continue to be direct bury (standard trenching equipment, minimal hand digging), with surface (pad) mounted equipment (transformers, pedestals, switch gear). Effective November 1, 2020, the standards change will require conduit to be used in all areas of adverse condition above or below ground, such as rocky soil, construction debris, uneven terrain, creek crossings, etc. The standards change will also require the use of conduit in areas where the Companies are not able to use standard methods and equipment to install, repair, or replace the underground cable. Conduit will start and end at

---

<sup>1</sup> DEC's Distribution Line Extension Plan was approved by Order No. 2016-727 in Docket No. 2016-345-E. DEP's Line Extension Plan E-66 was approved by Order No. 2016-871 in Docket No. 2016-227-E. The Companies' Line Extension Plans are on file in the Commission's E-Tariff System.


The Honorable Jocelyn G. Boyd  
September 10, 2020  
Page 2

junction points, such as pad mounted equipment (transformer, pedestal, switch gear), at the base of a pole, or at the base of a meter/meter structure. Any exceptions to the starting and ending point for the conduit will be provided by the Duke Energy designer.

Effective November 1, 2020, Duke Energy will no longer supply the conduit for road crossings or other areas where conduit was previously supplied as a courtesy. The customer will be required to provide and install the conduit as specified by the Companies, or the Companies will provide and install the conduit at the expense of the customer as a contribution in aid of construction. The Companies will notify customers via email beginning on October 1, 2020. Distribution employees will also notify their customers during conversations about new projects. This change will not apply to any projects where the builder or developer has already worked with the Duke Energy designer on the development, and the design was approved.

These changes will standardize the Companies' conduit requirements across the Carolinas and provide more clarity and consistency across jurisdictions for the customers we serve.

Sincerely,



Katie M. Brown

cc: Jeff Nelson, Office of Regulatory Staff  
Andrew Bateman, Office of Regulatory Staff  
Michael Seaman-Huynh, Office of Regulatory Staff